

**From:** [ANDERSON Jim M](#)  
**To:** [Eric Blischke/R10/USEPA/US@EPA](#); [Chip Humphrey/R10/USEPA/US@EPA](#)  
**Cc:** [MCCLINCY Matt](#); [POULSEN Mike](#); [PETERSON Jenn L](#); [OMEALY Mikell](#); [GAINER Tom](#)  
**Subject:** Upstream/Downstream Sediment Sampling FSP  
**Date:** 09/05/2006 10:30 AM

---

Eric & Chip,

Here are DEQ's comments on the LWG's 7/28/06 "*Preliminary Upstream & Downstream Sediment Data Evaluation & RD 3A FSP for Upstream & Downstream Sediment Sampling*".

### **General Comments**

1) While sediment, surface water, & TSS data collected at the upper end of the study area (RM 11.5) will help us to evaluate what is being deposited over time in the study area from upstream, the LWG should not consider this background. In their 4/24/06 comment letter regarding the LWG's RD3 Sediment Trap FSP, EPA stated that while the proposed traps at RM 11 will help evaluate the characteristics of sediment coming into the study area from upstream, the data will not necessarily be useful for determining background. EPA/partners agree with the LWG that sediment transported into the study area from upstream can help establish chemical concentrations below which bedded sediment cannot be remediated thru actions taken entirely within the study area. However, it is important to distinguish between upstream load & background.

2) The LWG's proposed scope of work does not include all the 12 surface sediment grab samples located downstream of the Study Area EPA recommended in their 2/17/06 "Scope of Work" letter to the LWG. These samples are needed to evaluate the possible extent of Study Area contaminants transported downstream.

### **Specific Comments**

1) Sediment data from near the boundaries of the Study area (Section 1.0, page 1)- As a point of clarification, the references text states that this FSP includes a preliminary compilation & evaluation of LWG-generated & non-LWG generated sediment data from near the boundaries of the study area as well as upstream & in Multnomah Channel. Table 2-1 appears to include all available, recent sediment data..., not just the data "near the boundaries".

2) Downtown reach (Section 2.1, page 5)- Why doesn't the LWG include an evaluation of the downtown reach (RM 11.7-16) of existing sediment data?

3) Upstream sediment cores (p.13)- The LWG proposes advancing 2 cores (RC483 at RM 9.6 & RC01 at RM10.5) to support the characterization of contaminant loading to the upper study area from upstream over time. We recommend a series of core samples (3 to 6 samples per transect) be located on each of 2 bank-to-bank transects in depositional areas in the vicinity of RM 11.5 & RM 16. Continuous cores should be collected, undergo stratigraphic interpretation, analyzed for Portland Harbor COIs, & analyzed for radioisotopes to date the samples. We consider the RM 11.5 transect to be the approximate upper end of the study area, & the data can be used to help evaluate what is being deposited over time in the study area from upstream. We consider the RM 16 transect to be the approximate upper end of both the industrialized & urban portions of the LWR & may be more representative of "background" conditions.

4) Sample locations (Figure 2-2 & Table 2-2)- Table 2-2 lists 9 Downstream sample locations, but Figure 2-2 shows 7 Downstream sample locations. Table 2-2 lists 11 USA sample locations, but Figure 2-2 shows 10 USA sample locations. Table 2-2 lists 41 UR sample locations, but Figure 2-2 shows 22 UR sample locations.

James M. Anderson  
DEQ Northwest Region  
Portland Harbor Section

Phone (503) 229-6825  
Fax (503) 229-6899